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FAX NO. 212-563-7108 P. 02

SHIBOLETH

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Shiboleth, Yisraeli, Roberts & Zisman, LLP

By Facsimile (212) 805-7927

October 8, 2007

Judge Naomi Reice Buchwald
United States District Court
Southern District of New York
500 Pearl Street, Room 2270
New York, New York 10007

Hochberg v. World Zionist Organization - American Section, Inc.
07 CV 3470 (NRB)(JCF)

Dear Judge Buchwald:

We represent defendant World Zionist Organization - American Section, Inc. in the above-referenced action. We are writing to request a pre-motion conference because we intend to file a motion to amend defendant's answer to plaintiff's amended complaint, pursuant to Federal Rules of Civil Procedure § 15(a).

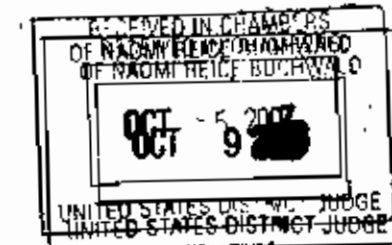
On August 7, 2007, plaintiff served an amended complaint upon defendant by mailing a copy of it to our offices. On August 16, 2007, we filed an answer to the amended complaint.

On September 12, 2007, while preparing responses for plaintiff's request for production of documents, we printed a copy of the amended complaint filed via ECF and discovered that the amended complaint electronically filed contained an extra page that was not included in the copy that was served upon defendant by mail. This page contained, *inter alia*, a third cause of action and allegations numbered 41 through 44.

That same day, we contacted counsel for the plaintiff, Gary Tsirelman, Esq., via telephone, to request consent to amend our answer to the amended complaint and respond to allegations 41 through 44, but Mr. Tsirelman did not consent.

Tel Aviv Affiliate
Museum Tower, 4
Berkowitz Street
Tel Aviv 64238 Israel
Phone 972-3-777-8333
Fax 972-3-777-8444
manager@shiboleth.com

1 Penn Plaza, Suite 2527 · New York, NY 10119
Phone 212-244-4171 · Fax 212-563-7108 · E-mail info@shiboleth.com

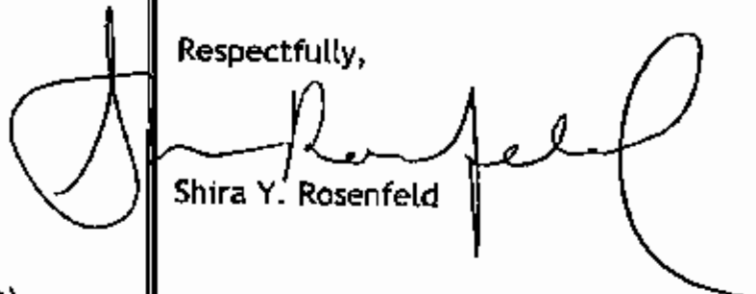
*Endorsement*

Defendant may file an Amended Answer to respond to paragraphs of the Amended Complaint not previously responded to. As ordered 10/11/07

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Therefore, we respectfully request a pre-motion conference to discuss defendant's motion to amend its answer to the amended complaint so that defendant can respond to allegations numbered 41 through 44 as well as include additional defenses with respect to those allegations.

Respectfully,

A handwritten signature in black ink, appearing to read 'Shira Y. Rosenfeld', written over a horizontal line.

Shira Y. Rosenfeld

cc: Gary Tsirelman, Esq. (by facsimile)